



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20411

RQ-3

December 19, 2002

Joe R. Arnold, Treasurer
Tennessee Republican Party Federal Election
Acct. Victory '96
1922 West End Avenue
Nashville, TN 37203

Identification Number: C00040220

Reference: Amended Year End Report (7/1/01-12/31/01), received 8/23/02 and
Amended April Quarterly Report (1/1/02-3/31/02), received 7/16/02

Dear Mr. Arnold:

This letter is to inform you that as of December 18, 2002 the Commission has not received your response to our requests for additional information dated November 27, 2002. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

An adequate response must be received at the Commission by January 8, 2003. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter, please contact Antoinette Kitchen on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RQ-2

Joe R. Arnold, Treasurer
Tennessee Republican Party Federal Election
Acct. Victory '96
1922 West End Avenue
Nashville, TN 37203

NOV 8 7 2002

Identification Number: C00040220

Reference: Amended April Quarterly Report (1/1/02-3/31/02), received 7/16/02

Dear Mr. Arnold:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The beginning cash balance of this report should equal the ending balance of your Amended 2001 Year End Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Schedule A of your report (pertinent portion(s) attached) discloses one or more contributions from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(1) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If any apparently prohibited contribution in question was incompletely or

TENNESSEE REPUBLICAN PARTY FEDERAL ELECTION ACCT. VICTORY '96
PAGE 2

incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible.

To the extent that your committee has received prohibited funds, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR 103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

TENNESSEE REPUBLICAN PARTY FEDERAL ELECTION ACCT. VICTORY '96
PAGE 3

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))
The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

-Schedule H4 of your report discloses an apparent contribution to "TN GOP Legislative Campaign". Please be advised that contributions to federal committees and/or non-federal committees/organizations do not qualify as shared expenses to be allocated between your federal and non-federal accounts. Contributions to federal committees should be disclosed on a Schedule B supporting Line 23 of the Detailed Summary Page and contributions to non-federal committees/organizations on a separate Schedule B supporting Line 29. Any reimbursement from your committee's non-federal account for any portion of this contribution(s) is not permissible. 11 CFR §102.5(a)(1)(i)

TENNESSEE REPUBLICAN PARTY FEDERAL ELECTION ACCT. VICTORY '96
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The Commission recommends that you immediately transfer the funds received by your federal account, as reimbursement for the non-federal portion, back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, your committee has checked the category "Fundraising" for all disbursements. However, in the purpose/event field you indicate the expenses were for "administration". Please amend your report to clarify this apparent discrepancy.

-Please be advised that Schedule H2 is used for shared federal and non-federal fundraising, exempt, and direct candidate support activity. The ratio for administrative expenses is derived from the Schedule H1 and should not be included on your Schedule H2. Please amend your report to clarify this discrepancy.

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designation and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Antoinette L. Kitchen
Senior Campaign Finance Analyst
Reports Analysis Division

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

 Use separate schedules
 for each category of the
 Detailed Summary Page

FOR LINE NUMBER: PAGE 74 of 75

(check only one)

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input checked="" type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
			<input type="checkbox"/> 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Tennessee Republican Party Federal Election Account

A. Full Name (Last, First, Middle Initial) Committee To Elect Bill Dunn		Date of Receipt M M D D Y Y Y 02 14 2002	
Mailing Address 5309 La Vesta Drive		Amount of Each Receipt This Period 200.00	
City Knoxville	State TN	Zip Code 37918-3534	
FEC ID number of contributing federal political committee.			
Name of Employer Cortase Tree Specialists	Occupation General Manager	Receipt	
Receipt For: Primary General Other (specify) ▼		Aggregate Year-to-Date ▼ 200.00	Transaction ID: 041420022C209435099
B. Full Name (Last, First, Middle Initial) The Honorable Steve McDaniel		Date of Receipt M M D D Y Y Y 02 08 2002	
Mailing Address 97 Battleground Drive		Amount of Each Receipt This Period 500.00	
City Wildersville	State TN	Zip Code 38388-	
FEC ID number of contributing federal political committee.			
Name of Employer Cotton Patch Restaurant	Occupation Owner	Receipt	
Receipt For: Primary General Other (specify) ▼		Aggregate Year-to-Date ▼ 500.00	Transaction ID: 0414200250C20921129
C. Full Name (Last, First, Middle Initial) American General PAC		Date of Receipt M M D D Y Y Y 02 13 2002	
Mailing Address American General Center		Amount of Each Receipt This Period 3000.00	
City Nashville	State TN	Zip Code 37250-0001	
FEC ID number of contributing federal political committee.			
Name of Employer American General PAC	Occupation Director, Governmental Relations	Receipt	
Receipt For: Primary General Other (specify) ▼		Aggregate Year-to-Date ▼ 3000.00	Transaction ID: 041420020C2093132431

SUBTOTAL of Receipts This Page (optional)

3700.00

TOTAL This Period (last page this line number only)

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 or each category of the
 Detailed Summary Page

FOR LINE NUMBER:

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(check only one)

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input checked="" type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17			

Any information copied from each Report and Statement may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)

Tennessee Republican Party Federal Election Account

Full Name (Last, First, Middle Initial)

A. Eastman Chemical PAC

Mailing Address

Mr. Charles Sorrells

Post Office Box 431

City

State

Zip Code

Kingsport

TN

37662-5280

Date of Receipt

 M M / D D / Y Y Y Y
 03 06 / 2002
FED ID number of contributing
federal political committee.

Amount of Each Receipt this Period

3000.00

Name of Employer
Eastman Chemical PAC

Occupation

Director, State Gov. Relations

Receipt

Receipt For:

Primary

General

Other (specify) ▼

Aggregate Year-to-Date ▼

3000.00

Transaction ID: 0414200212C210335243

Full Name (Last, First, Middle Initial)

B. Gaylord Entertainment PAC

Mailing Address

Mr. David Ewing

One Gaylord Drive

City

State

Zip Code

Nashville

TN

37214

Date of Receipt

 M M / D D / Y Y Y Y
 03 12 / 2002
FED ID number of contributing
federal political committee.

Amount of Each Receipt this Period

3000.00

Name of Employer

Occupation

Receipt

Receipt For:

Primary

General

Other (specify) ▼

Aggregate Year-to-Date ▼

3000.00

Transaction ID: 0414200213C2104632

Full Name (Last, First, Middle Initial)

C. Insurers of Tenn PAC

Mailing Address

Ahn: Chuck Bidek

2500 Hillsboro Road

City

State

Zip Code

Nashville

TN

37212

Date of Receipt

 M M / D D / Y Y Y Y
 01 31 / 2002
FED ID number of contributing
federal political committee.

Amount of Each Receipt this Period

1200.00

Name of Employer
Insurers of Tennessee PAC

Occupation

Receipt

Receipt For:

Primary

General

Other (specify) ▼

Aggregate Year-to-Date ▼

1200.00

Transaction ID: 0414200236C208359243

SUBTOTAL of Receipts This Page (optional) ▶

7200.00

TOTAL This Period (last page this line number only) ▶

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

FOR LINE NUMBER

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(check only one)

<input type="checkbox"/> 11a	<input checked="" type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17			

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Tennessee Republican Party Federal Election Account

Full Name (Last, First, Middle Initial)		Date of Receipt	
A. Montgomery Co. Republican Party		M M / D D / Y Y Y Y	
Mailing Address		01 / 02 / 2002	
C/O Lee Elder 502 Eysian Drive			
City	State	Zip Code	
Clarksville	TN	37040	
FEC ID number of contributing federal political committee		Amount of Each Receipt this Period	
		100.00	
Name of Employer	Occupation	Receipt	
Receipt For:	Aggregate Year-to-Date		
Primary General			
Other (specify) ▼	100.00		
		Transaction ID: 0128200238C201	

Full Name (Last, First, Middle Initial)		Date of Receipt	
B. Davidson County Republican Party		M M / D D / Y Y Y Y	
Mailing Address		01 / 03 / 2002	
Mr. Ken Duncan P.O. Box 158419			
City	State	Zip Code	
Nashville	TN	37215	
FEC ID number of contributing federal political committee		Amount of Each Receipt this Period	
		400.00	
Name of Employer	Occupation	Receipt	
Receipt For:	Aggregate Year-to-Date		
Primary General			
Other (specify) ▼	400.00		
		Transaction ID: 0128200240C206842	

Full Name (Last, First, Middle Initial)		Date of Receipt	
C. Davidson County Republican Party		M M / D D / Y Y Y Y	
Mailing Address		03 / 07 / 2002	
Mr. Ken Duncan P.O. Box 158419			
City	State	Zip Code	
Nashville	TN	37215	
FEC ID number of contributing federal political committee		Amount of Each Receipt this Period	
		400.00	
Name of Employer	Occupation	Receipt	
Receipt For:	Aggregate Year-to-Date		
Primary General			
Other (specify) ▼	300.00		
		Transaction ID: 0414200212C210410270	

SUBTOTAL of Receipts This Page (optional)

900.00

TOTAL This Period (last page this line number only)

900.00

2020.03.27. 14:05:00